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May 13, 2021

VIA ECF

The Hon. Mary Kay Vyskocil
United States District Court
Southern District of New York
500 Pearl Street
New York, NY 10007

Re: *La Dolce Vita Fine Dining Company Limited, et al. v. Zhang Lan, et al.*, 21-cv-03178-MKV

Dear Judge Vyskocil:

We represent Respondent Apex Lead Investment Holdings Limited (“Apex”). We write to request a brief adjournment of the pre-motion conference that is currently scheduled for May 25, 2021 (Dkt. 28) to either May 26th or May 27th because I will be traveling on May 25, 2021.

The other Respondents in this case, Zhang Lan, Grand Lan Holdings Group (BVI) Limited and Qiao Jiang Lan Development Limited (collectively, the “Zhang Respondents”), consent to this request. The Petitioners have no objection to an adjournment of the conference to May 26th or May 27th. Counsel for the Zhang Respondents, however, is unavailable after 1 p.m. on May 26th. This is Apex’s first request to adjourn the pre-motion conference.

Respectfully submitted,

/s/ Daniel P. Goldberger
Daniel P. Goldberger

cc: all counsel of record (via ECF)